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1	Debra L. Spinelli, Esq., Bar No. 9695 DLS@pisanellibice.com PISANELLI BICE PLLC 400 South 7th Street, Suite 300 Las Vegas, Nevada 89101 Telephone: 702.214.2100 Facsimile: 702.214.2101	
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5	Carolee A. Hoover, Esq. (pro hac vice forthcoming) CHoover@mcguirewoods.com Alexandra S. Farley, Esq. (pro hac vice forthcoming) AFarley@mcguirewoods.com McGuireWoods LLP Two Embarcadero Center Suite 1300 San Francisco, CA 94111-3821 Telephone: 415.844.1971 Facsimile: 415.844.1914 Attorneys for The Bank of Missouri dba Fortiva	
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12	UNITED STATES DISTRICT COURT	
13	DISTRICT OF NEVADA	
14	INNOCENT NGWA,	CASE NO.: 2:21-cv-02158-RFB-EJY
15	Plaintiff,	CTIDIH ATION AND IDDODOCEDI
16	v.	STIPULATION AND [PROPOSED] ORDER TO EXTEND TIME TO RESPOND TO THE COMPLAINT
17	EXPERIAN INFORMATION SOLUTIONS, INC., TRANSUNION, LLC, AND THE	
18	BANK OF MISSOURI DBA FORTIVA,	(First Request)
19	Defendants.	
20		
21	Defendant The Bank of Missouri DBA Fortiva ("Fortiva") and Plaintiff Innocent Ngwa	
22	("Plaintiff") (collectively, the "Parties"), by and through their respective counsel of record, hereby	
23	stipulate, pursuant to LR IA 6-1 and 6-2, to extend the deadline for Fortiva to respond to the	
24	Amended Complaint (ECF No. 19) by thirty (30) days, or up to and until Monday, June 6, 2022.	
25	Absent the extension, the deadline for Fortiva to answer or otherwise respond to the Amended	
26	Complaint is May 5, 2022. This is the first stipulation for an extension of time for Fortiva to	
27	respond to the Amended Complaint.	

1 The Parties believe the litigation of this matter is best served by extending the response 2 deadline by 30 days so that Fortiva, now with counsel retained, has sufficient time to respond to 3 the allegations in the Amended Complaint. 4 This stipulation is made in good faith, and not intended to cause delay, and not filed for an 5 improper purpose. 6 Dated this 3rd day of May, 2022. Dated this 3rd day of May, 2022. 7 PISANELLI BICE PLLC MARCUS & ZELMAN, LLC 8 /s/ Debra L. Spinelli By: /s/ Yitzchak Zelman 9 Debra L. Spinelli, Esq., Bar No. 9695 Yitzchak Zelman, Esq. 400 South 7th Street, Suite 300 (admitted pro hac vice) 10 Las Vegas, Nevada 89101 701 Cookman Avenue, Suite 300 Asbury Park, New Jersey 07712 11 Carolee A. Hoover, Esq. (pro hac vice forthcoming) Robert M. Tzall, Esq., Bar No. 13412 12 Alexandra S. Farley, Esq. LAW OFFICES OF ROBERT M. TZALL 13 (pro hac vice forthcoming) 7735 Commercial Way, Suite 100 MCGUIREWOODS LLP Henderson, NV 89011 14 Two Embarcadero Center (702) 666-0233 Tel. **Suite 1300** 15 San Francisco, CA 94111-3821 Attorney for Plaintiff Innocent Ngwa 16 Attorneys for The Bank of Missouri dba Fortiva 17 18 **ORDER** IT IS HEREBY ORDERED, ADJUDGED, AND DECREED, based on the Parties' 19

IT IS HEREBY ORDERED, ADJUDGED, AND DECREED, based on the Parties' stipulation above, Defendant Fortiva shall have thirty (30) days, or until June 5, 2022, to file its response to the Amended Complaint.

IT IS SO ORDERED.

UNITED SAATES MAGISTRATE JUDGE

DATED: May 3, 2022

CASE NO. 2:21-cv-02158-RFB-EJY

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